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**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF WYOMING**

In re:	)	
	)	Case No.: 16-20326
POWELL VALLEY HEALTH CARE,	)	Chapter 11
INC.,	)	
Debtor.	)	

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**MOTION TO VACATE AND CONTINUE HEARING ON DEBTOR'S MOTION  
TO ENFORCE SCOPE OF THE AUTOMATIC STAY, OR IN THE  
ALTERNATIVE, MOTION TO EXTEND AUTOMATIC STAY AND NOTICE  
OF OPPORTUNITY TO OBJECT AND THE OPPOSITION THERETO**

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Powell Valley Health Care, Inc. ("PVHC"), Debtor, hereby files this motion to vacate and continue the hearing on *Debtor's Motion Enforce Scope of the Automatic Stay, or in the Alternative, to Extend Automatic Stay* (the "Stay Motion") [Doc. 60] and the *Response in Opposition to Debtor's Motion to Enforce Scope of the Automatic Stay, or in the Alternative, Motion to Extend Automatic Stay* (the "Tort Claimant Objection to the Stay Motion") [Doc. 130] and the *Official Committee of Unsecured Creditors' Objection and Reservation of Rights Regarding Debtor's Motion to Enforce Scope of the Automatic Stay, or in the Alternative, Motion to Extend Automatic Stay and Notice of Opportunity to*

*Object* (the “Committee Objection to the Stay Motion”) [Doc. 191], and in support thereof shows the Court as follows:

1. On May 16, 2016 (the “Petition Date”), PVHC commenced this case (the “Chapter 11 Case”) by filing a voluntary petition for relief under chapter 11 of the Bankruptcy Code in the United States Bankruptcy Court for the District of Wyoming (the “Bankruptcy Court”).

2. PVHC has continued in the possession of its property and has continued to operate and manage its business as a debtor-in-possession pursuant to Bankruptcy Code §§ 1107 and 1108.

3. On June 21, 2016, the Office of the United States Trustee for Region 19 (the “U.S. Trustee”) appointed an official committee of unsecured creditors for the Chapter 11 Case (the “Creditor Committee”) [D.E. 145].

4. On May 24, 2016, PVHC filed its Stay Motion.

5. On June 9, 2016, several creditors (the “Tort Claimants”) filed their Objection to the Stay Motion. That same day, additional Tort Claimants filed a *Joinder in Opposition to Debtor’s Motion to Enforce Scope of the Automatic Stay, or in the Alternative, Motion to Extend Automatic Stay* [Doc. 132].

6. On June 28, 2016, HealthTech Management Services, Inc. filed its *Joinder in Support of the Debtor’s Motion to Enforce Scope of the Automatic Stay, or in the Alternative, Motion to Extend Automatic Stay* [Doc. 159].

7. On June 30, 2016, Powell Hospital District filed its *Joinder to Debtor’s Motion to Enforce Scope of the Automatic Stay or, in the Alternative, Motion to Extend*

*Automatic Stay and Notice of Opportunity to Object Filed by Powell Hospital District*  
[Doc. 176].

8. On July 5, 2016, the Creditor Committee filed its Committee Objection to the Stay Motion.

9. Since the formation of the Creditor Committee, counsel for PVHC, the Tort Claimants and the Creditor Committee have participated in discussions regarding, among other things, the Stay Motion and the Objection to the Stay Motion. At this juncture, PVHC and the Tort Claimants have agreed that it is in all parties' best interests to vacate and continue the hearing on the Stay Motion and the Objection to the Stay Motion currently set for July 7, 2016, at 9:00 a.m. The Creditor Committee has also agreed that the hearing should be continued.

**WHEREFORE**, PVHC respectfully requests that the Bankruptcy Court enter an order substantially in the form attached hereto at Exhibit A vacating and continuing the hearing on the Stay Motion and the Objection to the Stay Motion for at least thirty (30) days.

Dated: July 5, 2016  
Cheyenne, Wyoming

MARKUS WILLIAMS YOUNG AND  
ZIMMERMANN LLC

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Counsel for the Debtor and Debtor-in-Possession

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served, *electronically*, this 5th day of July, 2016, upon those parties listed below:

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/s/ Bradley T. Hunsicker

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